REMARKS

This Amendment is filed in response to the Office Action mailed on January 16, 2007. All objections and rejections are respectfully traversed.

Claims 1-28 are currently pending.

Claims 23-28 are added.

Request for Interview

The Applicant respectfully requests a telephonic interview with the Examiner after the Examiner has had an opportunity to consider this Amendment, but before the issuance of the next Office Action. The Applicant may be reached at 617-951-3067.

Claim Rejections – 35 USC § 102

At paragraph 2 of the Office Action, claims 1, 6-8, 12, 13, and 17-22 are rejected under 35 U.S.C. §102 as being anticipated by Nolan et al., US Patent No. 6,446,141, hereinafter Nolan.

The present invention, as set forth in representative claim 1, comprises in part:

1. A method for generating a lun map associated with an initiator for use with a storage system in a network environment, comprising:
    logging into the storage system by the initiator;
    identifying a set of luns that the initiator may access;
    creating a lun map associated with the initiator; and
    returning a set of accessible luns to the initiator.

By way of background, Nolan discloses an operating system for translating SCSI-3 instructions and data received over a communication interface to an internal format. A logical unit number (lun) associated with the SCSI-3 instructions is used to associate the SCSI-3 instructions and data with virtual devices including data stored on the storage server.

Applicant respectfully urges that Nolan does not disclose Applicant's claimed novel *identifying a set of luns that the initiator may access*, *creating a lun map associated with the initiator*, and *returning a set of accessible luns to the initiator*. In further detail, in Applicant's claimed invention a storage system is identifying which luns on the storage system that a particular initiator may access. Each lun has a list of client identifiers that may access a given lun. The storage system steps through the luns on the system to identify which luns the logged initiator may access. There is no disclosure in Nolan of identifying which luns a particular initiator may access. Nolan merely discloses that the LUN is part of a read request for accessing data on a server. Merely having a lun address does not guarantee that an initiator can access that particular lun.

Furthermore, as Nolan does not disclose *identifying a set of luns that the initiator may access*, Nolan can not disclose *returning a set of accessible luns to the initiator*.

Accordingly, Applicant respectfully urges that Nolan is legally insufficient to anticipate the present claims under 35 U.S.C. §102 because of the absence of the Applicant's claimed novel *identifying a set of luns that the initiator may access*, *creating a lun map associated with the initiator*, and *returning a set of accessible luns to the initiator*.

Claim Rejections – 34 USC § 103

At paragraphs 4-5 of the Office Action, claims 2-5, 9-11, and 14-16 were rejected under 35 U.S.C. §103 as being unpatentable over Nolan, in view of Bates et al, US Patent No. 6,977,927, hereinafter Bates.

The present invention, as set forth in representative claim 9, comprises in part:

9. A method for generating a lun map associated with an initiator for use with a storage system in a network environment, comprising:
　　(a) logging into the storage system by the initiator;
　　(b) selecting a lun data structure;
　　(c) *searching for a list of identifiers in the lun data structure to identify whether the initiator may access the selected lun*;
　　(d) repeating steps (b) and (c) for each lun data structure associated with the storage system;
　　(e) *creating a lun map using the identified luns to be associated with the initiator, the lun map comprising a set of ordered pairs mapping virtual luns to physical luns*; and
　　(f) *returning a set of accessible luns to the initiator.*

By way of background, Bates discloses a system for allocating storage resources in a storage area. A logical unit number (lun) mapper receives at least one storage request parameters to at least one physical lun. The lun mapper includes at least one lun map for each server, with the lun map identified using the server's host id value. The lun map is a two-dimensional array of physical lun data that is indexed by a target (server) host bus adapter.

Applicant respectfully urges that Nolan and Bates, taken alone or in combination, do not teach nor suggest Applicant's claimed novel *searching for a list of identifiers in the lun data structure to identify whether the initiator may access the selected lun*, *creating a lun map using the identified luns to be associated with the initiator, the lun*

map comprising a set of ordered pairs mapping virtual luns to physical luns, returning

a set of accessible luns to the initiator. In further detail, in Applicant's claimed inven-

tion, the storage system is determining (identifying) which lun data structures on the stor-

age system a particular initiator may access. The storage system steps through each lun

data structure and determines if the particular initiator is part of the list of identifiers that

may access a particular lun data structure. If the particular initiator is not part of the iden-

tifier list for a particular lun data structure, then the lun data structure is not added to the

list of accessible luns for a particular initiator. If the particular initiator is part of the

identifier list for a particular lun data structure, then the lun data structure is added to the

list of accessible luns for a particular initiator.

In contrast, there is no disclosure in Bates nor Nolan, of searching a list of identi-

fiers of a selected lun data structure to identify if a particular initiator may access the se-

lected lun. Bates merely discloses determining which lun map to use from a plurality of

maps based on a host id. In other words, Bates is determining which lun map is associ-

ated with a particular server, where the lun map stores <u>locations</u> of physical lun data.

There is no disclosure in Bates of searching a list of identifiers *in a lun data structure* to

identify if the initiator has access to the lun. Bates merely is mapping physical lun loca-

tions to host bus adapters for each server. Additionally, Nolan does not disclose search-

ing a list of identifiers in the lun data structure, as claimed by applicant, because Nolan

does not determine which luns an initiator may access.

Accordingly, Applicant respectfully urges that Nolan and Bates, taken alone or in

combination, are legally insufficient to make obvious the presently claimed invention un-

der 35 U.S.C. § 103 because of the absence of the Applicant's claimed novel *searching*

for a list of identifiers in the lun data structure to identify whether the initiator may

access the selected lun, creating a lun map using the identified luns to be associated

with the initiator, the lun map comprising a set of ordered pairs mapping virtual luns
to physical luns, returning a set of accessible luns to the initiator.

All independent claims are believed to be in condition for allowance.

All dependent claims are believed to be dependent from allowable independent claims.

Applicant respectfully solicits favorable action.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,

_/shannen c. delaney/._____
Shannen C. Delaney
Reg. No. 51,605
CESARI AND MCKENNA, LLP
88 Black Falcon Avenue
Boston, MA 02210-2414
(617) 951-2500